

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

3 davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

4 melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

5 johnneukom@quinnemanuel.com

Lindsay Cooper (Bar No. 254886)

6 jordanjaffe@quinnemanuel.com

50 California Street, 22nd Floor

7 San Francisco, California 94111-4788

Telephone: (415) 875-6600

8 Facsimile: (415) 875-6700

9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF PATRICK
SCHMIDT IN SUPPORT OF PLAINTIFF
WAYMO LLC'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF ITS REPLY IN SUPPORT
OF ITS MOTION FOR RELIEF FROM
NON-DISPOSITIVE PRETRIAL ORDER
OF MAGISTRATE JUDGE (DKT. 731)**

1 I, Patrick Schmidt, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
7 Seal portions of its July 7 Reply in Support of its Motion for Relief from Non-Dispositive Pretrial
8 Order of Magistrate Judge (Dkt. 731) (the “Reply”), filed concurrently herewith (the “Administrative
9 Motion”). The Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Reply	Highlighted Portions	Defendants

12
13 3. The highlighted portions of Waymo’s Reply contains references to information that
14 Defendants have designated as confidential and/or highly confidential.

15 4. Waymo expects Defendants to file one or more declarations in accordance with the
16 Local Rules.

17 I declare under penalty of perjury under the laws of the State of California and the United
18 States of America that the foregoing is true and correct, and that this declaration was executed in Los
19 Angeles, California, on July 7, 2017

20 By /s/ Patrick Schmidt
Patrick Schmidt
21 Attorney for WAYMO LLC

22 **SIGNATURE ATTESTATION**

23 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
24 filing of this document has been obtained from Patrick Schmidt.

25
26 /s/ Charles K. Verhoeven
Charles K. Verhoeven
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